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UBER TECHNOLOGIES, INC.
16 and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF DEFENDANT
OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF
ITS RESPONSE TO PLAINTIFF
WAYMO LLC'S CORRECTED
SUPPLEMENTAL BRIEF IN
SUPPORT OF ITS MOTION FOR
ORDER TO SHOW CAUSE (DKT.
1585)**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Defendant Otto Trucking's Administrative Motion to File Under Seal Portions of Its
6 Response to Plaintiff Waymo LLC's Corrected Supplemental Brief in Support of Its Motion for
7 Order To Show Cause (Dkt. 1585) ("Response").

8 2. I have reviewed the following documents and confirmed that only the portions
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 29	Blue-highlighted Portions

10
11
12
13 3. The blue-highlighted portions in Exhibit 29 contain the email addresses of high-
14 ranking company executives, whose email accounts may become compromised if disclosed to the
15 public. Defendants also seal the email address of a Google executive as a courtesy. Defendants
16 seek to seal this information in order to protect the privacy of these executives, as prominent
17 individuals in this lawsuit are currently the subject of extensive media coverage. Disclosure of
18 this information could expose these individuals to harm or harassment.

19 4. Defendants' request to seal is narrowly tailored to the portions of Otto Trucking's
20 Response and its supporting papers that merit sealing.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed this
22 19th day of September, 2017 in San Francisco, California.

23 _____
24 /s/ Michelle Yang

25 Michelle Yang
26
27
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ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: September 19, 2017

/s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ